

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES, AND
PRODUCTS LIABILITY LITIGATION

MDL No. 2738

NOTICE OF APPEARANCE

THIS DOCUMENT RELATES TO:

COLEEN MOORE GENN o/b/o BRIDGET
MOORE

Civil Case No. 3:17-cv-10599-FLW-LHG

NOTICE OF SPECIAL APPEARANCE

The undersigned counsel, pursuant to Case Management Order No. 4, enter their special appearances on behalf of Defendant Personal Care Products Council (“PCPC”), thereby denying all allegations in the Plaintiffs’ Short Form Complaints. Pursuant to paragraph 5 of Case Management Order No. 4, the entry of this Notice of Special Appearance does not waive any of PCPC’s defenses, objections, or motions available under state or federal law, including any challenge to jurisdiction. PCPC expressly reserves the right to move for dismissal of some or all of Plaintiffs’ claims and/or seek dismissal pursuant to Fed. R. Civ. P. 12, consistent with paragraph D of Case Management Order No. 2.

Dated: December 22, 2017

Respectfully submitted,

/s/ Thomas T. Locke, Esq.

Thomas T. Locke (DC Bar No. 454144)

Rebecca Woods (DC Bar No. 468495)

James R. Billings-Kang (DC Bar No. 984152)

SEYFARTH SHAW LLP

975 F Street, N.W.

Washington, DC 20004

Telephone: (202) 463-2400

Facsimile: (202) 828-5393

tlocke@seyfarth.com

rwoods@seyfarth.com

jbillingskang@seyfarth.com

Attorneys for Defendant Personal Care Products Council

CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

/s/ Thomas T. Locke
Thomas T. Locke